

Exhibit A

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION
No. 07-cv-05944 SC
This Document Relates to: MDL No. 1917
...(continuing caption page 2)

SUPERIOR COURT OF THE STATE OF CALIFORNIA
CITY AND COUNTY OF SAN FRANCISCO

STATE OF CALIFORNIA, et al.,
Plaintiffs,
v.
SAMSUNG SDI, INC., CO., LTD,
et al.,
Defendants.

HIGHLY CONFIDENTIAL
DEPOSITION OF LG ELECTRONICS
MOK HYEON SEONG
San Francisco, California
Monday, July 9, 2012
Volume I

Reported by:
SUZANNE F. BOSCHETTI
CSR No. 5111

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1 Electronics Inc. and LG Electronics USA Inc.? 11:03:06

2 A Yes, I do. 11:03:38

3 Q All right. Am I -- is it your testimony 11:03:39

4 that LG Electronics USA did not sell any CRTs in the 11:03:41

5 United States during the period 1995 through June of 11:03:49

6 2001? 11:03:53

7 A Correct. 11:04:12

8 Q Okay. Just for purposes of background, do 11:04:12

9 you speak English? 11:04:16

10 MR. MUDGE: Objection. Form. 11:04:19

11 THE WITNESS: I do a little bit. I can 11:04:20

12 exchange greetings. 11:04:22

13 BY MR. SPECKS: 11:04:24

14 Q But you would not consider yourself 11:04:24

15 proficient in English? 11:04:28

16 A I just told you I can only exchange 11:04:34

17 greetings. 11:04:38

18 Q What's your understanding of what the LG 11:04:38

19 defendants are accused of doing in this case? 11:04:50

20 MR. MUDGE: Objection. Vague. 11:05:03

21 THE WITNESS: Based on what I heard, I 11:05:28

22 believe the litigation was brought because CRT 11:05:32

23 prices were fixed, and because of that, the TV 11:05:40

24 monitor prices were affected. I believe that is why 11:05:48

25 the litigation started. 11:05:53

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8 I, MOK HYEON SEONG, do hereby declare under
9 penalty of perjury that I have read the foregoing
10 transcript of my deposition; that I have made such
11 corrections as noted herein, in ink, initialed by
12 me, or attached hereto; that my testimony as
13 contained herein, as corrected, is true and correct.

14 EXECUTED this 22 day of AUGUST,
15 2012, at SEOUL, KOREA.
16 (City) (State)

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MOK HYEON SEONG

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1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 I further, certify I am neither financially
13 interested in the action nor a relative or employee
14 of any attorney or party to this action.

15 IN WITNESS WHEREOF, I have this date
16 subscribed my name.

17
18 Dated: 7/20/12
19
20
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22

23 SUZANNE F. BOSCHETTI

24 CSR No. 5111
25

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ERRATA SHEET**CRT 30(b)(6) Deposition of LGE Defendants - MOK HYEON SEONG****July 9, 2012**

Page	Line	Change and/or Correction	Reason
12	11	Delete "you were"	Transcription error
19	15	"2006" to "2001"	Inaccurate translation later clarified by interpreter
35	22	"Manlose" to "Melrose"	Transcription error
41	2	"She" to "He"	Transcription error
44	1	"LG Display" to "LG Philips Display"	Transcription error
48	19	"Changwon" to "Chunghwa"	Transcription error
49	5	"Interrogatories" to "list of questions"	Inaccurate translation later clarified by interpreter
54	17	"LGP" to "LG Philips"	Clarification of response
55	13	"operation of board" to "Board of Management"	Inaccurate translation later clarified by interpreter
67	11	"became the CEO" to "he was COO in the beginning and then he became the CEO"	Inaccurate translation later clarified by interpreter
73	2	"below" to "beyond"	Transcription error
78	21	"computated" to "computed"	Clarification of response
80	4	"Changwon" to "Changsha"	Inaccurate translation later clarified by interpreter
81	11	"monitored" to "monitor"	Transcription error
81	21	"monitored" to "monitor"	Transcription error
83	3	"LG Philips was" to "LG Philips Display was"	Clarification of question
83	11	"LG Displays" to "LG Philips Display"	Clarification of question
92	13	"CRTs" to "CRT TVs"	Inaccurate translation later clarified by interpreter
95	11	"boiling" to "baking"	Inaccurate translation later clarified by interpreter

102	1	“different levels” to “differently”	Inaccurate translation later clarified by interpreter
108	20	“PCBAs” to “PCBs”	Transcription error
110	18	“display” to “Display”	Clarification of response
112	3	“display” to “Display”	Clarification of response
112	18	“JFK” to “GFK”	Clarification of response
117	4	“Then” to “That”	Clarification of response
123	6	“2000. LG Electronics” to “2000. Because LGE did not count Zenith’s sales performance as part of LGE’s sales performance, LG Electronics”	Inaccurate translation later clarified by interpreter
123	7	“do not have any information about that” to “do not have Zenith sales data”	Inaccurate translation later clarified by interpreter